REMARKS/ARGUMENTS

This Amendment is being filed in response to the Office Action dated November 15, 2007. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-20 are currently pending in the Application. Claims 1 and 11 are independent claims.

Claims 7 and 9 are rejected under 35 U.S.C. §112, second paragraph as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicant regards as the invention. Applicants have amended claims 7 and 9 to correct obvious typographic errors that had claim 7 erroneously claiming dependence on claim 5 and had claim 9 erroneously claiming dependence on claim 7. With these amendments, claim 7 now properly claims dependence on claim 6 and claim 9 now properly claims dependence on claim 8. Accordingly, it is respectfully submitted that claims 7 and 9 are now in proper form and it is respectfully requested that these rejections be withdrawn.

Claims 1-4, 6, 8 and 10 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 6,211,488 to Hoekstra ("Hoekstra") in view of U.S. Patent No. 6,673,752 to Bookbinder ("Bookbinder"). Claims 5, 7 and 9 are rejected under 35 U.S.C. § 103 as allegedly unpatentable over Hoekstra and Bookbinder in view of U.S. Patent No. 5,565,363 to Iwata ("Iwata"). These

rejections are respectfully traversed. It is respectfully submitted that claims 1-20 are allowable over Hoekstra in view of Bookbinder alone, and in view of Iwata for at least the following reasons.

Hoekstra shows an apparatus that utilizes a laser and a cooling stream together with breaking beams to break a substrate. Hoekstra makes clear that (emphasis added) "a pulsed laser is used, it forms a crack inside the substrate that does not extend to either the upper or lower surface." (See, abstract.) As shown in FIG. 4, "[t]he pulsed laser 34 through the lens 35 creates a void 37 in the substrate from the edge of the substrate 4 inward at a certain distance below the upper face of the substrate 4." (See, Col. 5, lines 62-64.) The cooling stream is delivered after the application of the laser and before the breaking beams.

Bookbinder is directed to a device that utilizes an organic solution as a cutting fluid that provides a slippery surface on a cutting blade. As shown in FIG. 1 of Bookbinder, the cutting fluid is applied to the cutting blade and not to the material being cut. The organic solution binds to chips that are cut away from the material being cut to keep the particles from clogging the abrading surface of the cutting blade (see, Col. 2, lines 51-61).

While the Applicants strenuously object to the combination of Hoekstra and Bookbinder in that each are directed to a very different method of separating pieces of the material, even if in arguendo the combination is conceded, even in combination the

present system is not disclosed or suggested. Even in substituting the organic solution of Bookbinder in the device of Hoekstra, one is still provided with a system wherein the cracks in the substrate are formed in the substrate and not on the substrate. Accordingly, even in substituting the organic solution of Bookbinder for the cooling stream of Hoekstra, one is not provided with the present system.

It is respectfully submitted that the method of claim 1 is not anticipated or made obvious by the teachings of Hoekstra in view of Bookbinder. For example, Hoekstra in view of Bookbinder does not disclose or suggest, a method that amongst other patentable elements, comprises (illustrative emphasis provided) "heating the substrate with a laser beam to create a heated spot on the substrate, ... cooling the heated spots on the substrate by locally applying a cooling medium such that a micro-crack in the line of heated spots is propagated on the substrate" as recited in claim 1, and as similarly recited in claim 11. Clearly in Hoekstra, the heated spot and micro-crack is purposefully propagated in the substrate without extending to the outer or lower surface of the substrate. Iwata is cited in rejecting dependent claims and as such, does nothing to cure the deficiencies in each of Hoekstra and Bookbinder.

Based on the foregoing, the Applicants respectfully submit that independent claims 1 and 11 are patentable over Hoekstra in view of Bookbinder and notice to this effect is earnestly

solicited. Claims 2-10, 12-20 respectively depend from one of claims 1 and 11 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of the claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

By_____
Gregory L. Thorne, Reg. 39,398
Attorney for Applicant(s)
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THORNE & HALAJIAN, LLP
Applied Technology Center
111 West Main Street
Bay Shore, NY 11706
Tel: (631) 665-5139
Fax: (631) 665-5101

By /Frank J. Keegan/
Frank J. KEEGAN, Reg. 50,145
Attorney
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